

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**JOINT MOTION FOR EXTENSION OF DEADLINE RE:
JOINT LISTING OF DOCKET ENTRIES THAT SHOULD
BE UNSEALED AND SUPPORTING BASIS FOR CONTINUED SEALING**

The defendant, Dzhokhar Tsarnaev, and the United States, by and through counsel, respectfully request the Court to extend the deadline regarding disputed docket entries by two weeks, to April 11, 2016. The parties have developed and traded rationales for their respective positions regarding the remaining docket entries and narrowed the number of disputed docket entries that require ruling by the Court to less than a half dozen. To obviate disputes, the parties in many cases have agreed to redactions rather than complete document entry sealing and need additional time to complete the document redactions and insure that all documents are ready for the Court and the clerk's office. The parties request until April 11, 2016, to do so and to submit a chart of the small number of remaining disputes to the Court.

The parties therefore jointly request the Court extend the deadline for submitting the chart setting forth disputed docket entries to April 11, 2016.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

DZHOKHAR TSARNAEV

By his attorneys

By: /s/ Alope S. Chakravarty
William D. Weinreb
Alope S. Chakravarty
Assistant U.S. Attorneys

/s/ Timothy Watkins
Judy Clarke, Esq. (CA Bar # 76071)
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800
San Diego, CA 92101
(619) 308-8484
JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq.
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 460-8188
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER
OFFICE 51
Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 28, 2016.

/s/ Timothy G. Watkins